

January 18, 2019

Joe Bernard
Principal Project Coordinator
City of Minneapolis
105 5th Avenue South, Room 200
Minneapolis, MN 55123

RE: City of Minneapolis 2040 Comprehensive Plan – Incomplete for Review
Metropolitan Council Review File No. 22166-1
Metropolitan Council Districts 6, 7, and 8

Dear Mr. Bernard:

Thank you for the submission of the City of Minneapolis' Comprehensive Plan (Plan) on December 28, 2018. Council staff found that there are areas where the Plan is incomplete. Review of the Plan will be suspended until the additional information is submitted and found complete for review. The following items were found incomplete:

REQUIRED INFORMATION

Authorizing Resolution (Michael Larson, 651-602-1407)

The Plan submittal must include a copy of the signed resolution authorizing submittal to the Metropolitan Council. The Plan indicates that the City Council took action on December 7, 2018 but does not include the appropriate documentation.

Adjacent and Affected Jurisdiction Review (Michael Larson, 651-602-1407)

The Plan documents the City's initial notification on March 22, 2018. The notification stated that the Plan would be adding "additional information and figures in the coming weeks." The notice further states that the City would provide updated e-mail notifications when such information was added. Although the Council expects plans to be modified during the review period, the Council cannot determine if the Plan was substantially complete when initially sent for review, or if relevant supplemental information was shared with jurisdictions that may be affected by such information. The City needs to submit additional documentation of what additional information was developed, and when the subsequent notifications occurred, to confirm that all adjacent and affected jurisdictions were provided the opportunity to review and comment on the complete Plan.

Forecasts (Todd Graham, 651-602-1322)

The Plan includes forecasts proposed by City staff in October 2018 (Appendix B, Figure 1.1), but the proposed 2020 household forecast should be revised. Council staff find that development now in the pipeline will not be enough to reach 191,500 households in 2020. Council staff can agree to revise the 2020 households to 190,700 households. Other forecast revisions remain consistent with development capacity and planned land use.

Minneapolis								
	Census	Estimates	City Proposed Forecasts			Council Staff Proposal		
	2010	2017	2020	2030	2040	2020	2030	2040
Population	382,578	423,990	435,992	460,002	484,997	436,000	460,000	485,000
Households	163,540	180,340	<u>191,508</u>	200,926	212,447	<u>190,700</u>	200,900	212,500
Employment	281,732	324,014	332,395	346,198	360,000	332,400	346,200	360,000

Advisory Comments

The forecast allocations by transportation analysis zones (TAZs) in Appendix D should be revised so that 2020 allocations are consistent with the proposed 2020 forecast revisions above.

With the forecast revision for 2020 described above, the 2021-2030 affordable housing need allocation would remain the same as that in the System Statement. If the 2021-2030 growth does not remain 10,200 households, the need number will require recalculation.

The City includes a population forecast chart, Figure G2.1. Council staff could not determine whether the chart is consistent with the forecast above. Council staff recommend revising the figure to include clear labels.

On pages 48 and 108, the Plan states that the “Metropolitan Council estimates that Minneapolis had 315,300 jobs in 2015, and project that the City’s employment will grow by 33,054 by 2040.” This statement is inaccurate. The data source for historical employment is Minnesota DEED (not the Metropolitan Council) and the 2015 employment count was 318,500 (not 315,300). The Council agrees with the City’s forecast revision in that employment in Minneapolis could reach 360,000 in 2040, which is a higher amount of growth than 33,054.

The Council requires that plans include some measure of employment-bearing land use intensity. Ordinarily, acceptable measurements of intensity include Floor Area Ratio (FAR) or building footprint coverage. Instead, the Plan provides “Built Form Districts” with expected ranges of building floor height. Council staff find this element sufficiently complete, but request that the City translate the allowed floor height ranges into a FAR measure.

Land Use (Michael Larson, 651-602-1407)

Future Land Use

The Plan must geographically identify (map) areas where the City expects development and redevelopment to occur. Using the growth assumptions in the TAZ allocations should inform this mapping. The Council encourages the City to submit more geographically precise information that relates to the development opportunities supported by policy and represented by the guiding land use and/or built form maps. Figures 4-1 and 4-2 of Appendix B suggest that this geographic analysis has already occurred.

Residential Density Ranges

The Plan must incorporate residential density ranges in its land use policy, expressed as dwelling units per acre (units/acre). The Plan addresses land use policy in the Land Use and Built Form Topic (beginning on p. 54) but does not incorporate this requirement. It should be addressed in this section directly. Alternatively, there should be explicit references to Appendix B – Land Use, which addresses and analyzes density as a technical matter. The Plan currently does not contain any references to this Appendix.

Residential Land Use Percentages

The Plan must include estimates for the percentage of land used for residential uses in land use guiding that allow a mix of uses. The Land Use and Built Form topic addresses this indirectly. However, the Council requires a numerical percentage, which would likely be incorporated into Figure 3-1 of Appendix B.

Consistency of Density Policy

Appendix B characterizes residential density ranges for each land use in Figure 3-1. The Plan cannot state, as it does in the footer of Figure 3-1 (p. B-4), that it “is not inconsistent with the policies in the Plan to build at residential densities greater than those identified in this table”. This statement is also used in Figures 3-1, 4-1, and 4-2. The Metropolitan Council requires various sets of information to conduct system planning and analysis against regional policy. It is also inconsistent with Minnesota statute regarding the use of official controls to implement the Plan. This includes forecasts allocated by sewershed, zonal allocations for transportation planning, and land use capacity as expressed by the potential number of households (units/acre).

The Plan must identify density ranges that are consistent with development densities that the City has been supporting through recent comprehensive plan amendments and development approvals, including that which raised the maximum density to 800 units/acre. The highest maximum density represented in Figure 3-1 is 175 units/acre (Public, Office, & Institutional).

The density range identified in Figure 3-1 for Public, Office, and Institutional is too broad, too low, and does not reflect recent and proposed development in the areas guided for this designation. Figure 3-1 lists the range as 8 to 175 dwelling units per acre (units/acre). A large inventory of this land is in the central business district. The minimum density of 8 units/acre is inconsistent with the Core 50 Built Form District, which requires a minimum of 10 stories and has no height limit. A maximum of 175 units/acre does not support, for example, several proposed and recent developments including the Portland and Washington Mixed-use Development (200 units/acre), 4Marq (720 units/acre) and 600 Washington Avenue SE (660 units/acre).

2040 Transportation Policy Plan Density Requirements

The Plan must incorporate additional documentation and analysis regarding consistency with density requirements of the *2040 Transportation Policy Plan*. This may be a concern given the low minimum density for the land use designations of Community Mixed Use and Corridor Mixed Use.

Redevelopment Staging Documentation

The Plan must provide additional documentation on the land use staging that is represented in Figure 3-1. The table characterizes an expansion of total acreage over time, suggesting capacity for growth at the respective densities. However, the inventory of land for Public, Office, and Institutional declines over time. This is inconsistent with the findings in Figure 4-1, which indicates that this land use guiding will result in 984 units. Council staff surmise that the land use inventory is shrinking, but that the percentage residential is increasing. To clarify, the City should provide an inventory of acreage by decade (e.g., 2021-2030) and by guiding land use, that the City projects will be available for development rather than evolving totals.

Consistency of Land Use Analysis / Documentation

The Plan must include additional documentation and resolve inconsistencies related to the unit and density analysis presented in Figures 4-1 and 4-2, including the following:

- The density shown for the Public, Office, and Institutional guiding land use is 170.74 units/acre, near the high end of the “typical range” of 8 to 175 shown in Figure 3-1.
- The density acre shown for the Transit 30 and Core 50 built form districts are 217.80 and 181.50 units/acre, higher than guiding land uses of Destination Mixed Use (150 units/acre) and Public, Office, and Institutional (175 units/acre).
- Although the unit totals for each table are similar, the total inventory of land in each appear different. Council staff assume these inventories should be the same. If they are not, the Plan needs to provide a narrative explaining their relationship and their differences.
- The roughly 49,000 units presented in each of these tables is much higher than the projected household growth through 2040. Council staff request information on what this land inventory represents, where it is located, and how the densities were determined.

Advisory Comments

The Land Use and Built Form Topic section (beginning on p. 54) does an outstanding job of characterizing the land use and built form guidance. It expertly describes, illustrates, and maps the types and mix of uses as well as the height and orientation of buildings. Although there are several land use related matters to address related to density and location of future development, it appears that they can be easily resolved.

To address the concerns around density ranges expressed above, staff suggest exploring whether the data/policy in Figure 3-1 could be modified to take the Built Form districts into consideration. For example, the following guiding land use could be divided:

- Public, Office, and Institutional + Core 50
- Public, Office, and Institutional + Transit 20

Staff encourage the City to increase the upper ends of density ranges for guiding land uses to incorporate the densities of recent and proposed projects and potential future projects of similar nature that are likely to occur. The density ranges associated with guiding land uses are not entitlements. The Plan can provide policy language to articulate the circumstances under which the high ends of density ranges are realized (e.g., affordable housing, unique or constrained sites, small units, unique amenities/design, etc.).

Housing (Tara Beard, 651-602-1051)

Existing Housing Need

- The Plan must include numerical values for housing cost burdened households in addition to percentage values. These can be added to Figure P33.1 or in a separate table.
- The Plan must reference the number of units affordable within the three bands of affordability.

Projected Housing Need

- Figure 3-1 of Appendix must identify the anticipated percentage of land in Mixed Use categories that the City expects would develop as residential. This is used to identify the land supply inventory to support the development of affordable housing during 2021-2030.

Implementation Plan

The Plan must address the following specific tools, which must be described including the level of local support of those tools (some of which require local match dollars, technical assistance, or formal support):

- Use of CDBG and HOME funds
- Efforts to monitor and address expiring Low Income Housing Tax Credit properties

Advisory Comments

The Plan states on page 6 that housing is one of the regional systems planned by the Metropolitan Council. Housing is not a system overseen by the Council. Only transportation, wastewater, and regional parks are regional systems. This is an important detail that should be corrected in the Plan.

On page 166 the Plan refers to “housing goals set by the Metropolitan Council,” and the “Allocation of Affordable Housing Need goals set by the Metropolitan Council”. Rather than a “goal,” the allocation represents a projected need. A reasonable goal for the City would be to meet that need, but the Council is providing information, not setting local goals and priorities. Language on p. C-6 similarly mislabels Council data as a “goal” for the City.

Parks (Colin Kelly, 651-602-1361)

- Describe all the Regional Parks System facilities that are located in your community, including the following:
 - Regional Parks: Minneapolis Chain-of-Lakes, Minnehaha, Nokomis-Hiawatha, North Mississippi, and Theodore Wirth (Above the Falls, Central Mississippi Riverfront, and Mississippi Gorge regional parks were referenced and described briefly in the context of their master plans and the Mississippi River Critical Corridor Area);
 - Regional Trails: Cedar Lake, Columbia Parkway, Kenilworth, Luce Line, Minnehaha Parkway, Northeast Diagonal, Ridgway Parkway, St. Anthony Parkway, Victory Memorial Parkway, and Shingle Creek regional trails; and
 - Regional Trail Search Corridor: Grand Rounds Missing Link.
- Map and label all the Regional Parks System facilities that are located in your community, including the following:
 - Regional Parks: Above the Falls, Central Mississippi Riverfront, Minneapolis Chain-of-Lakes, Mississippi Gorge, Minnehaha, Nokomis-Hiawatha, North Mississippi, and Theodore Wirth;
 - Regional Trails: Cedar Lake, Columbia Parkway, Kenilworth, Luce Line, Minnehaha Parkway, Northeast Diagonal, Ridgway Parkway, St. Anthony Parkway, Victory Memorial Parkway, and Shingle Creek regional trails; and
 - Regional Trail Search Corridor: Grand Rounds Missing Link.
- Acknowledge the Council-approved master plan boundaries of regional parks, park reserves, and special recreation features by guiding the properties with a land use of “Park” (or your community’s equivalent) on your Future Land Use map:
 - The Council-approved master plan boundary of Minnehaha Regional Park needs to be acknowledged and guided as “Parks and Open Space” in Figure T1.3: “Future Land Use Map *Citywide*” on pg. 61 of the Plan.
 - It appears a portion of Minnehaha Regional Park is currently guided as “Urban Neighborhood” and needs to be guided “Parks and Open Space” instead.

- The Council-approved master plan boundary of Central Mississippi Riverfront Regional Park needs to be acknowledged and guided as “Parks and Open Space” in Figure T1.3c: “Future Land Use Map *East Sector*” on pg. 64 of the Plan.
 - It appears at least one parcel southeast of Hennepin Ave (PIN 053-2302924240087) is currently guided “Public, Office, and Institutional” and needs to be guided “Parks and Open Space” instead.
- The Council-approved master plan boundary of Central Mississippi Riverfront Regional Park needs to be acknowledged and guided as “Parks” in Figure T1.4c: “Built Form Map *East Sector*” on pg. 77 of the Plan.
 - It appears at least one parcel southeast of Hennepin Ave (PIN 053-2302924240087) is guided “Interior 3” and should be “Parks” instead.
- The Council-approved master plan boundary of Minnehaha Regional Park needs to be acknowledged and guided as “Parks” in Figure T1.4d: “Built Form Map *South Sector*” on pg. 78 of the Plan.
 - It appears a portion of Minnehaha Regional Park is currently guided as “Interior 3” and needs to be guided “Parks” instead.

Transportation (Russ Owen, 651-602-1724)

Transportation Action Plan

Appendix D states that the planned update to the City’s Transportation Action Plan will occur in 2019 and will include new and altered guidance regarding the use and design of public rights-of-way in the City of Minneapolis. The Appendix does not provide any further information on the project’s scope. It further states that “none of the information that follows should be understood to preempt guidance as proposed in that update”. This statement should be revised, as it is inconsistent with the statutory role of the Plan. Any conflicts that arise between the City’s Plan and an updated Transportation Action Plan need to be resolved through a comprehensive plan amendment to resolve the conflict. Regardless of the outcome, the updated Transportation Action Plan should be included as an amendment to the City’s Plan and submitted to the Council for review.

Transit

The Plan must describe existing and planned transit services in the City, not just map them. Figures 12, 13, and 14 in Appendix D map transit system elements, but these figures are not accompanied by narrative descriptions, detailed legends, or labels. The Plan must provide a meaningful description of the transit services that are available and planned in the City, as well as explain the City’s role in their development including policy support for their effectiveness.

Bicycling and Walking

The Plan must describe the Regional Bicycle Transportation Network (RBTN) in the City. Though Figure 19 maps RBTN corridors and alignments, the plan does not provide any description of the network or how existing and planned alignments fulfill the intent of RBTN corridors.

Advisory Comments

Please consider providing specific ADT for each Principal Arterial and A-Minor Arterial. The Plan currently uses ADT ranges which are not as useful in analyzing traffic volumes in the City.

Though the Plan provides a map of Current Revenue Scenario planned improvements to Principal Arterials in Minneapolis, the City should be aware of more current information in the updated *2040 Transportation Policy Plan* that can be reflected in the Plan.

Though the Plan maps existing and planned MnPASS lanes and other transit advantages, we encourage the City to incorporate descriptions of these elements.

Consider adding contextual street labels to Figure 11 of Appendix D to better understand the geography of the two transit market areas found in Minneapolis.

Figures 12 and 16 show some temporary detours in the transit network. Consider incorporating the most recent shape files for these routes, effective December 2018.

Wastewater (Roger Janzig, 651-602-1119)

- The City needs to submit GIS shapefiles or equivalent showing information for the existing sanitary sewer system including lift stations, existing connections points to the metropolitan disposal system, local sewer service districts by connection point, and intercommunity connections.
- The City needs to submit GIS shape files or equivalent showing the location of sub-surface sewage treatment systems (SSTS) and the location of nonconforming systems or systems with problems. The Plan states there are only three SSTS (aka ISTS) within the entire City. Recognizing the small number of these systems within the City, the Council will accept the property addresses where these systems are located so that they can be included in the Council's data set for regional SSTS counts.
- The Plan needs to include copies of intercommunity service agreements with adjoining communities, including a map of areas covered by the agreements.
- Describe the requirements and standards in your community for minimizing inflow and infiltration.
 - Include a copy of the local ordinance or resolution that prohibits discharge from sump pumps, foundation drains, and/or rain leaders to the sanitary sewer system.
 - Include a copy of the local ordinance or resolution requiring the disconnection of existing foundation drains, sump pumps, and roof leaders from the sanitary sewer system.
- Describe the sources, extent, and significance of existing inflow and infiltration in both the municipal and private sewer systems.
 - Include a breakdown of residential housing stock age within the community into pre- and post-1970 era, and what percentage of pre-1970 era private services have been evaluated for I/I susceptibility and repair.
 - Include the measured or estimated amount of clearwater flow generated from the public municipal and private sewer systems.

Advisory Comments

The Plan states that no new intercommunity agreements were executed after 2008 and, therefore, the Plan includes no agreements that cover the identified intercommunity flow service areas. Communities were required to include copies of these agreements with their 2008 comprehensive plan updates, but Minneapolis did not include them. Council staff request that these be submitted, if available, to make the comprehensive sewer plan fully complete. However, considering the 2008 cutoff language, the Council will not require this as we recognize that intercommunity service areas are all located within adjacent communities with wastewater that flows into the City.

Community Wastewater Treatment and Subsurface Sewage Treatment Systems (SSTS)
(Jim Larsen, 651-602-1159)

The Plan must include a map depicting the parcel locations of the eight SSTS remaining in operation in the City.

Mississippi River Corridor Critical Area (MRCCA) (Jim Larsen, 651-602-1159)

The MRCCA Plan is currently undergoing a 45-day review by the Minnesota Department of Natural Resources (DNR). The Plan will be incomplete for this element until the DNR has issued its conditional approval letter. The DNR will communicate directly with the City about the review and approval of the MRCCA element under the Critical Areas Act (Minn. Statute 116G.07 Subd. 3) and the MRCCA Rules (Minn. Rules 6106.0070 Subp. 3. E.).

Water Supply (Dave Brown, 651-602-1072)

The Plan must include a copy of the approved Local Water Supply Plan (LWSP). Page 2-11 of the Water Resource Management Plan states that the water supply section has been developed as a separate section, but the Plan submittal did not include this. It should be included as an attachment or appendix.

Implementation (Michael Larson, 651-602-1407)

Capital Improvement Program (CIP)

The Plan's Implementation Chapter describes the City's capital improvement planning process on page 269 and includes a link to the City's Public Works Capital Improvements Projects (CIP) website. The Plan states that a full version of the 2018-2022 CIP can be found in the Appendix. However, the CIP was not included as an appendix. The Plan must incorporate into the electronic document an overall CIP, or CIP summary, that identifies major capital investments over five years for each of the areas of transportation, sewers, parks and open space, and water supply facilities. As relevant, the Plan's Implementation Chapter should specify the timing and sequencing of these public investments. If any of these planning areas do not have needs for capital investment, the CIP should state as such.

Zoning Map

The Plan's Implementation Chapter summarizes the City's zoning districts, provides a link to the City's zoning code online, and states that zoning maps are included as an Appendix. However, the zoning maps were not included. To be complete, the Plan must incorporate the zoning maps.

OTHER ADVISORY INFORMATION

Council staff offer the following additional advisory comments for your consideration.

Surface Water Management (Jim Larsen, 651-602-1159)

Council staff request that the City provide the dates that the four watersheds approved the final LWMP, and the date the City adopted the final LWMP. We also request that the City provide the Council with a copy of its final adopted LWMP to be included in the Plan document that the City adopts, if it differs from the version contained in this submittal.

Plan Structure (Michael Larson, 651-602-1407)

The Plan should label the appendices in the table of contents and include references between the body of the Plan and the appendices. This material represents technical/supportive material and articulation of policy.

To expedite the Council's review of supplemental materials submitted in response to incomplete items, please provide a cover memo that outlines where and how the incomplete items are addressed in the new material. Also, as with the original submittal, please use the online submittal for supplemental information.

After all of the required elements of the Plan are submitted and found complete, Council staff will begin the official review process. If you have any questions or need further information regarding the comments in this letter, please contact Michael Larson, Sector Representative, at 651-602-1407 with any questions or for additional assistance.

Sincerely,



Lisa Beth Barajas, Director
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CC: Matt Bauman, Minnesota Department of Natural Resources
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